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CAH: USAO#2018R00221

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2018 MAY -2 PM 5:02
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
U.S. DISTRICT OFFICE
AT BALTIMORE

UNITED STATES OF AMERICA BY KX DEPUTY

v.

ANTWAN BASS
and
DANIELLE ROBINSON,

Defendants.

CRIMINAL NO. 6LR-18-0265

(Conspiracy to Distribute Heroin and
Cocaine, 21 U.S.C. § 846; Possession
with Intent to Distribute Heroin and
Cocaine, 21 U.S.C. § 841; Aiding and
Abetting, 18 U.S.C. § 2)

INDICTMENT

COUNT 1

(Conspiracy to Distribute Heroin and Cocaine)

The Grand Jury for the District of Maryland charges that:

From at least in or about November 2017 through March 13, 2018, in the District of Maryland
and elsewhere, the defendants,

**ANTWAN BASS
and
DANIELLE ROBINSON,**

did knowingly and willfully combine, conspire, confederate, and agree with others known and
unknown to the Grand Jury to knowingly and intentionally distribute and possess with intent to
distribute one kilogram or more of a mixture or substance containing a detectable amount of
heroin, a Schedule I controlled substance; and 500 grams or more of a mixture or substance
containing a detectable amount of cocaine, a Schedule II controlled substance; in violation of
Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (b)(1)(B).

21 U.S.C. § 846

COUNT 2
(Possession With Intent To Distribute Heroin and Cocaine)

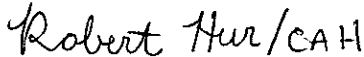
The Grand Jury for the District of Maryland charges that:

On or about March 13, 2018, in the District of Maryland, the defendants,

ANTWAN BASS
and
DANIELLE ROBINSON,

knowingly and willfully possessed with intent to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance; and 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (b)(1)(B).

21 U.S.C. § 841.
18 U.S.C. § 2



ROBERT K. HUR
UNITED STATES ATTORNEY

A TRUE BILL:

5/2/18

Date

SIGNATURE REDACTED

Foreperson